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May 21, 2021

VIA ECF

Hon. Sanket J. Bulsara
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Courtroom 324N
Brooklyn, New York 11201

Re: *Durand, et al., v. Excelsior Care Group LLC d/b/a Cold Spring Hills Center for Nursing and Rehabilitation and Emanuel*, Docket No. 1:19-cv-02810-KAM-SJB

Dear Judge Bulsara:

This firm represents Defendant Excelsior Care Group LLC d/b/a Cold Spring Hills Center for Nursing and Rehabilitation (“CSH”) in the above-referenced action. We write jointly with Plaintiffs’ counsel to request an additional two weeks (until June 4, 2021) to finalize the parties’ settlement agreement on Plaintiffs’ wage and hour claims, including Plaintiffs’ forthcoming motion for approval of the settlement.

Accordingly, the parties respectfully request that the Court set a control date of June 4, 2021 for Plaintiff to file its motion for approval, and for the parties to propose an updated briefing schedule as to any dispositive motions for the remaining discrimination-related claims.

Thank you for your time and attention to this matter.

Respectfully Submitted,

/s/ Samuel J. Bazian

Samuel J. Bazian

cc: All Counsel of Record (via ECF)